

FOR THE WESTERN DISTRICT OF OKLAHOMA

BLACK EMERGENCY RESPONSE TEAM,
et al.,

Plaintiffs,

v.

JOHN O'CONNOR, in his official capacity as
Oklahoma Attorney General, et al.,

Defendants.

Civil Action No.: 21-CV-1022-G

PLAINTIFFS' UNOPPOSED MOTION TO FILE EXCESS PAGES

On November 16, 2021, Defendants Board of Regents for the University of Oklahoma, Michael Cawley, Frank Keating, Phil Albert, Natalie Shirley, Eric Stevenson, Anita Holloway, and Rick Nagels (the "University of Oklahoma Board of Regents Defendants"); Defendants Angela Grunewald, Jamie Underwood, Cynthia Benson, Kathleen Duncan, and Lee Ann Kuhlman (the "Edmond Defendants"); and Defendants 1-18 filed responses to Plaintiffs' motion for preliminary injunction and briefs in support (Doc. Nos. 58, 60, 61). Plaintiffs may submit replies 10 pages in length each, with a total of 30 pages for replies. LCvR7.1(i).

Plaintiffs respectfully request leave of this Court to file a combined reply brief of 25 pages. Plaintiffs request an excess of 15 pages to the reply page limit; however, Plaintiffs' single combined brief would comprise of 5 fewer pages than filing separate briefs of 10 pages each, decreasing the number of Plaintiffs' pages for replies overall.

Additionally, Plaintiffs' combined reply would present the Court with a combined and streamlined reply to Defendants' briefs, providing a better aid to the Court in resolving the key issues raised by both parties regarding the preliminary injunction and increasing the efficiency of briefing.

Defendants have been consulted and do not object to this request.

Genevieve Bonadies Torres
David Hinojosa
LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW
1500 K Street NW, Suite 900
Washington, DC 20005

Gary Stein
Michael Cutini
Sara Solfanelli
Elahe Hosseini
Amir Shakoorian Tabrizi
Ramya Sundaram
SCHULTE ROTH & ZABEL LLP
919 Third Avenue
New York, NY 10022

Respectfully submitted,

/s/ Megan Lambert
Megan Lambert
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF OKLAHOMA
P.O. Box 13327
Oklahoma City, OK 73113
Tel.: 405-524-8511
mlambert@acluok.org

Emerson Sykes
Leah Watson
Sarah Hinger
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004

Counsel for Plaintiff

